

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PAULA F. SOTO,
Plaintiff,

v.

C.A. No. 13-10822-JGD

CITY OF CAMBRIDGE,
Defendant.

**DECLARATION OF SAMUEL A. AYLESWORTH IN SUPPORT OF DEFENDANT
CITY OF CAMBRIDGE'S OPPOSITION TO PLAINTIFF PAULA F. SOTO'S MOTION
FOR SUMMARY JUDGMENT**

I, SAMUEL A. AYLESWORTH, pursuant to 28 U.S.C. § 1746, hereby declare the following under penalty of perjury:

1. I am an Assistant City Solicitor for the City of Cambridge and am counsel of record for the Defendant City of Cambridge (the "City") in this action. I am a member in good standing of the bar of Massachusetts and I am admitted to practice in the United States District Court for the District of Massachusetts. I submit this declaration in support of Defendant's Opposition to Plaintiff's Motion for Summary Judgment. I have personal knowledge of the statements contained in this declaration and, if called as a witness, would testify competently to the statements contained in this declaration.

2. Attached hereto as Exhibit A is a true and accurate copy of Cambridge Municipal Ordinance Chapter 9.04 as amended on May 18, 2015.

3. Attached hereto as Exhibit B is a true and accurate copy of the minutes of the City of Cambridge Ordinance Committee Hearing held on June 18, 2014.

4. Attached hereto as Exhibit C is a true and accurate copy of Cambridge Municipal Ordinance Chapter 2.54.050.

5. Attached hereto as Exhibit D is a true and accurate copy of document Bates No. SOTO 400 that was produced by the Plaintiff Paula F. Soto in response to the City's Requests for the Production of Documents, dated August 12, 2014, (Soto December 15, 2011 Email).

6. Attached hereto as Exhibit E is a true and accurate copy of Cambridge Municipal Ordinance Chapter 9.04.030 (Trespassing on public property).

7. Attached hereto as Exhibit F is a true and accurate copy of Cambridge Municipal Ordinance Chapter 1.04.050 (Chapter Headings Ordinance).

8. Attached hereto as Exhibit G is a true and accurate copy of Cambridge Municipal Ordinance Chapter 8.24.170 (Littering Ordinance).

9. Attached hereto as Exhibit H is a true and accurate copy of Communication to the City Council from City Manager Richard C. Rossi dated January 5, 2015 (Bulletin Board Report).

10. Attached hereto as Exhibit I is a true and accurate copy of document Bates No. SOTO 2310 that was produced by the Plaintiff Paula F. Soto in response to the City's Requests for the Production of Documents, dated August 12, 2014.

11. Attached hereto as Exhibit J is a true and accurate copy of document Bates No. SOTO 451 that was produced by the Plaintiff Paula F. Soto in response to the City's Requests for the Production of Documents, dated August 12, 2014.

I, SAMUEL A. AYLESWORTH, declare under the pains and penalties of perjury that the foregoing is true and correct. Executed in Cambridge, Massachusetts on May 29, 2015.

/s/ Samuel A. Aylesworth

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this document was filed through the Electronic Case Filing (ECF) system and thus copies will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF); paper copies will be mailed to those indicated on the NEF as non-registered participants on or before May 29, 2015.

/s/ Samuel A. Aylesworth